

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Batesville Products, Inc.
434 Margaret Street
Lawrenceburg, Indiana 47025**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 029-11732-00032	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary Decorative Hexavalent Chromium Electroplating manufacturing facility.

Authorized Individual: Justin C. Weber, Jr.
Source Address: 434 Margaret Street, Lawrenceburg, IN 47025
Mailing Address: 434 Margaret Street, Lawrenceburg, IN 47025
Phone Number: (812) 537-2275
SIC Code: 3429
County Location: Dearborn
County Status: Nonattainment for SO₂
Attainment area for all other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD or Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (1) One (1) Decorative Chromium Electroplating Operation consisting of:
 - (a) One (1) decorative chromium electroplating tank, identified as Tank # 20, using a hexavalent chromium bath, equipped with a wetting agent type fume suppressant, and exhausting to one (1) stack, identified as stack # 12;
- (2) One (1) polishing and grinding operation, with an average capacity of 397 pounds per hour, using one (1) flat stroke machine with one (1) 2" x 132" sanding belt, four (4) belting lathes with two (2) 2" x 132" sanding belts, four (4) buffing lathes with two (2) stations each, two (2) color buff lathes with two (2) stations each, all utilizing one (1) baghouse for particulate matter control and one (1) slow speed satin buff;
- (3) One (1) natural gas fired immersion fired steam boiler identified as 100971, with an average maximum heat input rate of 1.265 million (MM) British thermal units (Btu) per hour, and exhausting through stack # 7;
- (4) Two (2) natural gas fired heaters identified as Heater # 1 and Heater # 2 (located in the storage area), each with an average maximum heat input rate of 0.024 MMBtu per hour, and exhausting through stacks 22 and 28, respectively;
- (5) One (1) natural gas fired heater identified as unit heater (located in the machine shop), with an average maximum heat input rate of 0.025 MMBtu per hour, and exhausting through stack 17;
- (6) One (1) natural gas fired heater identified as unit heater (located in the shipping), with

an average maximum heat input rate of 0.144 MMBtu per hour, and exhausting through stack 29;

- (7) One (1) natural gas fired heater identified as unit heater (located in the plating area), with an average maximum heat input rate of 0.15 MMBtu per hour, and exhausting through stack 18;
- (8) One (1) natural gas fired furnace identified as furnace (located in office #1), with an average maximum heat input rate of 0.1 MMBtu per hour, and exhausting through stack 2;
- (9) One (1) natural gas fired furnace identified as furnace (located in office #2), with an average maximum heat input rate of 0.08 MMBtu per hour, and exhausting through stack 19; and
- (10) One (1) polishing and blasting operation, with an average capacity of 300.4 pounds per hour, using two (2) belting lathes with 2"x132" sanding belts, six (6) hand vibrating finishers (only two in operation at a time) and one (1) abrasive blasting machine, all utilizing one (1) cartridge dust collector for particulate matter control.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of any criteria pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plan as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements (IDEM will split samples with Permittee upon the request of the Permittee prior to the sampling event); and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements (IDEM will provide Permittee with results of any testing upon the request of the Permittee).

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent

reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

- (d) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

at least sixty (60) days before the intended test date for all chromium electroplating facilities and no later than thirty-five (35) days prior to the intended test date for all other facilities. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two (2) weeks prior to the test date.

Compliance Monitoring Requirements

C.10 Maintenance of Monitoring Equipment [IC 13-14-1-13]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:

- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (d) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) One (1) Decorative Chromium Electroplating Operation consisting of:
 - (a) One (1) decorative chromium electroplating tank, identified as Tank # 20, using a hexavalent chromium bath, equipped with a wetting agent type fume suppressant, and exhausting to one (1) stack, identified as stack # 12.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

D.1.2 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

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The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tank # 20. A copy of this rule is attached.

D.1.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.
- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tank # 20 by:
 - (1) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.01 mg/dscm) [equivalent to four and four-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (4.4×10^{-6} gr/dscf)]; or
 - (2) Not allowing the surface tension of the decorative chrome bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent to three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb_f/ft)] at any time during operation of tank # 20 when a chemical fume suppressant containing a wetting agent is used.

D.1.4 Work Practice Standards [40 CFR 63.342(f)]

The following work practice standards apply to tank # 20:

- (a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tank # 20, including the wetting agent type fume suppressant and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.6.

- (b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.1.6.
- (c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.
- (d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.
- (e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAM may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAM finds that the plan:
 - (1) Does not address a malfunction or period of excess emissions that has occurred;
 - (2) Fails to provide for the operation of tank # 20, the wetting agent type fume suppressant and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or
 - (3) Does not provide adequate procedures for correcting malfunctioning process equipment, wetting agent type fume suppressant, monitoring equipment or other causes of excess emissions as quickly as practicable.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP), in accordance with Section B-Preventive Maintenance Plan, of this permit, is required for tank # 20 and the wetting agent type fume suppressant.

D.1.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tank # 20. The OMP shall specify the operation and maintenance criteria for tank # 20, the wetting agent type fume suppressant and monitoring equipment and shall include the following elements:
 - (1) Manufacturers recommendations for maintenance of the monitoring equipment used to measure surface tension;
 - (2) A standardized checklist to document the operation and maintenance criteria for tank # 20, the wetting agent type fume suppressant and the monitoring equipment.
 - (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.
 - (4) A systematic procedure for identifying malfunctions and periods of excess emissions of tank # 20, the wetting agent type fume suppressant and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.
- (b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans

such as the PMP required in Condition D.1.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.1.6(a).

- (c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tank # 20, the wetting agent type fume suppressant and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.
- (d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.
- (e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of tank # 20 or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.7 Performance Testing [326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

- (a) A performance test demonstrating initial compliance for tank # 20 was performed on October 31, 1995. Subsequent performance tests were also performed on August 7, 1996, October 7, 1996, and December 9, 1996.

During the initial performance test, it was determined that the surface tension of the bath, using Method 306B, Appendix A of 40 CFR 63, was 26 dynes/cm.
- (b) The Permittee is not required to further test tank # 20 by this permit. However, the IDEM may require testing when necessary to determine if the tank is in compliance. If testing is required by the IDEM, compliance with the limits specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of tank # 20, the wetting agent type fume suppressant or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-6.1-5(a)(2)]

- (a) Pursuant to 40 CFR 63.343(c)(5)(ii) and (iii), when using a wetting agent in the

electroplating bath to comply with the limits specified in Condition D.1.3, the Permittee shall monitor the surface tension of the electroplating baths. Operation of tank # 20 at a surface tension greater than 45 dynes per centimeter shall constitute noncompliance with the standards.

- (1) The Permittee shall monitor the surface tension of the electroplating bath during tank operation according to the following schedule:
 - (A) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of this part.
 - (B) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation.
 - (C) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (B) above. For example, if a Permittee had been monitoring a tank once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.
 - (2) Once a bath solution is drained from tank # 20 and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures in paragraphs (B) and (C) above.
- (b) Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts is considered operating time. The meter installed on the rectifier to measure operating time is acceptable provided the meter is operated such that it records when the rectifier is on and there is a part in the tank.

Record Keeping and Reporting Requirements ~~[326 IAC 2-5.1-3(e)(2)]~~ [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements [40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.1.3, D.1.4 and D.1.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a

minimum of the following:

- (a) Inspection records for the wetting agent type fume suppressant and monitoring equipment to document that the inspection and maintenance required by Conditions D.1.7 and D.1.8 have taken place. The record can take the form of a checklist and should identify the following:
 - (1) The device inspected;
 - (2) The date of inspection ;
 - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
 - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tank # 20, the wetting agent type fume suppressant and monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tank # 20, monitoring equipment.
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tank # 20, and monitoring equipment as indicated by monitoring data collected in accordance with this condition.
- (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
- (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
- (g) Test reports documenting results of all performance tests.
- (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
- (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
- (j) The total process operating time, as defined in Condition D.1.8(b), of the tank, during the reporting period.
- (k) Records of the date and time that fume suppressants were added to the electroplating bath, and the amount and type of fume suppressant added.
- (l) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.1.10.

D.1.10 Reporting Requirements [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

The notifications and reports required in this section shall be submitted to IDEM, OAM using the

address specified in Section C - General Reporting Requirements.

(a) Notifications:

(1) Initial Notifications

The Permittee shall notify IDEM, OAM in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).

(2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

(A) The NCS shall be submitted to IDEM, OAM, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).

(B) The NCS for tank # 20 shall be submitted to IDEM, OAM no later than forty-five (45) days following completion of the compliance demonstration pursuant to Section C - Performance Testing.

(3) Notification of Construction or Reconstruction

Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAM. In addition, the Permittee may not change, modify, or reconstruct tank # 20 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAM.

(A) The NCR shall contain the information identified in 40 CFR 63.345(b)(2) and (3).

(B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling the existing tank and non-affected facilities by a common control technique or device [i.e., the addition of duct work to the CMP system (if a CMP system is used to demonstrate compliance with the chromium emission limitation)].

(C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tank # 20 serves as this notification.

(D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAM before construction, modification, or reconstruction may commence.

(b) Ongoing Compliance Status Report

The Permittee shall prepare summary reports to document the ongoing compliance status of tank # 20 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tank # 20 is located at a site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAM upon request.

- (1) The Ongoing Compliance Status Report shall be complete according to the following schedule except as provided in paragraphs (c)(2).
 - (A) The first report shall cover the period from the issuance date of this permit to December 31 of the year in which the permit is issued.
 - (B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.
- (2) If either of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM, OAM:
 - (A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.8(b) for the reporting period; or
 - (B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.1.8(b).

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semiannually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

- (3) IDEM, OAM may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (2) One (1) polishing and grinding operation, with an average capacity of 397 pounds per hour, using one (1) flat stroke machine with one (1) 2" x 132" sanding belt, four (4) belting lathes with two (2) 2" x 132" sanding belts, four (4) buffing lathes with two (2) stations each, two (2) color buff lathes with two (2) stations each, all utilizing one (1) baghouse for particulate matter control and one (1) slow speed satin buff;
- (3) One (1) natural gas fired immersion fired steam boiler identified as 100971, with an average maximum heat input rate of 1.265 million (MM) British thermal units (Btu) per hour, and exhausting through stack # 7;
- (4) Two (2) natural gas fired heaters identified as Heater # 1 and Heater # 2 (located in the storage area), each with an average maximum heat input rate of 0.024 MMBtu per hour, and exhausting through stacks 22 and 28, respectively;
- (5) One (1) natural gas fired heater identified as unit heater (located in the machine shop), with an average maximum heat input rate of 0.025 MMBtu per hour, and exhausting through stack 17;
- (6) One (1) natural gas fired heater identified as unit heater (located in the shipping), with an average maximum heat input rate of 0.144 MMBtu per hour, and exhausting through stack 29;
- (7) One (1) natural gas fired heater identified as unit heater (located in the plating area), with an average maximum heat input rate of 0.15 MMBtu per hour, and exhausting through stack 18;
- (8) One (1) natural gas fired furnace identified as furnace (located in office #1), with an average maximum heat input rate of 0.1 MMBtu per hour, and exhausting through stack 2;
- (9) One (1) natural gas fired furnace identified as furnace (located in office #2), with an average maximum heat input rate of 0.08 MMBtu per hour, and exhausting through stack 19; and
- (10) One (1) polishing and blasting operation, with an average capacity of 300.4 pounds per hour, using two (2) belting lathes with 2"x132" sanding belts, six (6) hand vibrating finishers (only two in operation at a time) and one (1) abrasive blasting machine, all utilizing one (1) cartridge dust collector for particulate matter control.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate Matter (PM)

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), particulate emissions from the polishing and grinding operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10(0.1985)^{0.67} = 1.39 \text{ lbs PM/hour}$$

Based on the above equation, particulate matter emissions from the polishing and grinding operation shall be limited to 1.39 pounds per hour.

- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) from the one (1) natural gas-fired boiler (ID No. 100971) shall not exceed 0.6 pounds per million Btu heat input.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Batesville Products, Inc.
Address:	434 Margret Street, Lawrenceburg, IN 47025
City:	Lawrenceburg
Phone #:	(812) 537-2275
MSOP #:	029-11732-00032

I hereby certify that Batesville Products, Inc. is ☒ still in operation.
☐ no longer in operation.

I hereby certify that Batesville Products, Inc. is ☒ in compliance with the requirements of MSOP 029-11732-00032.
☐ not in compliance with the requirements of MSOP 029-11732-00032.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND
REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

PAGE 1 OF 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for**

the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**MINOR SOURCE OPERATING PERMIT
CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT**
(Complete this form for each affected tank)

Source Name: Batesville Products, Inc.
Source Address: 434 Margret Street, Lawrenceburg, IN 47025
Mailing Address: 434 Margret Street, Lawrenceburg, IN 47025
MSOP Permit No.: 029-11732-00032

Tank ID #: _____
Type of process: Decorative
Monitoring Parameter: Surface tension of the electroplating bath
Parameter Value: 45 dynes per centimeter
Limits: Total chromium concentration may not exceed 0.01 mg/dscm if the chromium electroplating bath does not meet 45 dynes per centimeter

This form is to be used to report compliance for the Chromium Electroplating NESHAP only.
The frequency for completing this report may be altered by the IDEM, OAM, Compliance Branch.

Companies classified as a major source: submit this report no later than 30 days after the end of the reporting period.
Companies classified as an area source: complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.

This form consists of 2 pages

Page 1 of 2

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:
TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

MAJOR AND AREA SOURCES: CHECK ONE			
9	NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.		
9	THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).		
AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY: IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

**CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT**

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

- | | |
|---|--|
| 9 | I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE. |
| 9 | THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED. |

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Minor Source Operating Permit (MSOP)

Source Name: Batesville Products, Inc.
Source Location: 434 Margaret Street, Lawrenceburg, IN 47025
SIC Code: 3429
County: Dearborn
Operation Permit No.: MSOP 029-11732-00032
Permit Reviewer: Nishat Hydari/EVP

On March 9, 2000, the Office of Air Management (OAM) had a notice published in the Dearborn County Register, Lawrenceburg, Indiana, stating that Batesville Products, Inc. had applied for a Minor Source Operating Permit (MSOP) to operate a Decorative Hexavalent Chromium Electroplating manufacturing facility. The notice also stated that OAM proposed to issue a MSOP for this operation and provided information on how the public could review the proposed MSOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this MSOP should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit:

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plan as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.6 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.

- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

On April 3, 2000, Justin C. Weber, Jr., Executive Vice President of Batesville Products, Inc. submitted comments. The summary of the comments and corresponding responses is as follows (bolded language has been added, the language with a line through it has been deleted):

Comment # 1

We are adding another Department that we are calling "Polishing and Blasting". The new process equipment that will be used in this Department includes polishing, hand vibrator finishing, and cut wire blasting of zinc and aluminum castings. The new equipment will be supported by a new dust collection duct system and a new cartridge dust collector. The new cartridge dust collector has an efficiency of 99.5+% and will operate at 5120 cfm. The fine aluminum and zinc particles produced by the process equipment are expected to be totally collected by this system. The total maximum production and collection rate will be 2.75 lbs/hr when the department is in full production (third year), but only 9.9% of that material is \leq 100 microns. Consequently, the total is:

$$2.75 \text{ lbs/hr} \times 0.099 \times 8760 \text{ hrs/yr} \times 1 \text{ ton} / 2000 \text{ lbs} = 1.2 \text{ tons/yr},$$

which is well below the regulation limit. With the 99.5+% removal efficiency of the cartridge dust collector, less than 2.7×10^{-4} lbs/hr will pass through the unit. The air discharged from the unit will be recycled back into the work area. There will be no stack, i.e., outside discharge, associated with the collector. In addition, the "potential to emit" for this unit is less than 5 tons/yr. Consequently, we feel that this new process should also be treated as an insignificant activity.

We have enclosed a revised Form F Flow Chart for the total plant which includes this New Department, a revised Drawing B-2 which shows the location of the new Department within the facility, a new Drawing F-2 which shows the layout of the new equipment and the dust collection system, Form E which provides process information, an additional Form F flow chart for the new Department and Form Q1.

Response # 1

The calculation sheet for the Polishing and Blasting Department is attached (Page 4 of 4 TSD Addendum App A).

The unit description for the Polishing and Blasting Department has been added to Section A.2 of the permit.

A.2 Emissions units and Pollution Control Equipment Summary

- (h) One (1) natural gas fired furnace identified as furnace (located in office #1), with a maximum heat input rate of 0.1 MMBtu per hour, and exhausting through stack 2; ~~and~~

- (i) One (1) natural gas fired furnace identified as furnace (located in office #2), with a maximum heat input rate of 0.08 MMBtu per hour, and exhausting through stack 19- and;
- (j) **One (1) polishing and blasting operation, with an average maximum capacity of 300.4 pounds per hour, using two (2) belting lathes with 2"x132" sanding belts, six (6) hand vibrating finishers (only two in operation at a time) and one (1) abrasive blasting machine, all utilizing one (1) cartridge dust collector for particulate matter control.**

The unit description for the Polishing and Blasting Department has been added to Section D.2 of the permit and 326 IAC 6-3-2 (Particulate Matter) limit has been added to Section D.2.1.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) polishing and grinding operation, with an **average** maximum capacity of 397 pounds per hour, using one (1) flat stroke machine with one (1) 2" x 132" sanding belt, four (4) belting lathes with two (2) 2" x 132" sanding belts, four (4) buffing lathes with two (2) stations each, two (2) color buff lathes with two (2) stations each and one (1) slow speed satin buff, all utilizing one (1) baghouse for particulate matter control;
- (c) One (1) natural gas fired immersion fired steam boiler identified as 100971, with an **average** maximum heat input rate of 1.265 million (MM) British thermal units (Btu) per hour, and exhausting through stack # 7;
- (d) Two (2) natural gas fired heaters identified as Heater # 1 and Heater # 2 (located in the storage area), each with an **average** maximum heat input rate of 0.024 MMBtu per hour, and exhausting through stacks 22 and 28, respectively;
- (e) One (1) natural gas fired heater identified as unit heater (located in the machine shop), with an **average** maximum heat input rate of 0.025 MMBtu per hour, and exhausting through stack 17;
- (f) One (1) natural gas fired heater identified as unit heater (located in the shipping), with an **average** maximum heat input rate of 0.144 MMBtu per hour, and exhausting through stack 29;
- (g) One (1) natural gas fired heater identified as unit heater (located in the plating area), with an **average** maximum heat input rate of 0.15 MMBtu per hour, and exhausting through stack 18;
- (h) One (1) natural gas fired furnace identified as furnace (located in office #1), with an **average** maximum heat input rate of 0.1 MMBtu per hour, and exhausting through stack 2; and
- (i) One (1) natural gas fired furnace identified as furnace (located in office #2), with an **average** maximum heat input rate of 0.08 MMBtu per hour, and exhausting through stack 19- and
- (j) **One (1) polishing and blasting operation, with an average maximum capacity of 300.4 pounds per hour, using two (2) belting lathes with 2"x132" sanding belts, six (6) hand vibrating finishers (only two in operation at a time) and one (1) abrasive blasting machine, all utilizing one (1) cartridge dust collector for particulate matter control.**

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate Matter (PM)

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), particulate emissions from the polishing and grinding operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 * (0.1985)^{0.67} = 1.39 \text{ lbs PM/hour}$$

Based on the above equation, particulate matter emissions from the two (2) sandblasters shall be limited to 1.39 pounds per hour.

- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) from the one (1) natural gas-fired boiler (ID No. 100971) shall not exceed 0.6 pounds per million Btu heat input.

- (c) Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter emissions from the polishing and blasting operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 * (0.1502)^{0.67} = 1.15 \text{ lbs PM/hour}$$

Based on the above equation, particulate matter emissions from the polishing and blasting operation shall be limited to 1.15 pounds per hour.

Comment # 2

There were a couple of errors in the calculation and reporting of the grain loading rate. The correct grain loading rate for the baghouse is 1.809×10^{-4} grains/cubic foot based on the fraction of the collected zinc and aluminum fines that is ≤ 100 microns (36.9% of the total material collected). Consequently, the total is 4.753 tons/yr, without control. We have enclosed revised forms E (1 of 2) and Q1. Please note that there is no outside stack for the baghouse; all of the air is recycled back into the work area. In addition, the "potential to emit" for this unit is less than 5 tons/yr.

Response # 2

The grain loading rate has been revised. The revised calculation sheet (Page 3 of 4 of TSD Addendum App A) is attached.

Comment # 3

- A.2(a) Sentence: chromium plating tank with a 3000 Ampere (amps) rectifier; should read; chromium plating tank with up to a maximum 3000 Ampere (amps) rectifier.

We are a job shop. Very seldom do we plate at 3000 amps.

Response # 3

Since the permit has been on public notice, extensive decorative chromium plating language has been updated by IDEM, OAM. The following changes have been made to Section A.2(a) due to the language change. The new language does not mention rectifier rate, which should satisfy the comment made by the source.

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- ~~(a) One (1) 300 gallon decorative hexavalent chromium plating tank with a 3000 ampere (Amps) rectifier, identified as Tank # 20, using wetting agent type fume suppressant (identified as Ethone Zero Mist R 31176) as control and exhausting to stack # 12;~~
- (1) One (1) Decorative Chromium Electroplating Operation consisting of:**
 - (a) One (1) decorative chromium electroplating tank, identified as Tank # 20, using a hexavalent chromium bath, equipped with a wetting agent type fume suppressant, and exhausting to one (1) stack, identified as stack # 12;**
 - (b2) One (1) polishing and grinding operation, with an **average** maximum capacity of 397 pounds per hour, using one (1) flat stroke machine with one (1) 2" x 132" sanding belt, four (4) belting lathes with two (2) 2" x 132" sanding belts, four (4) buffing lathes with two (2) stations each, two (2) color buff lathes with two (2) stations each and one (1) slow speed satin buff, all utilizing one (1) baghouse for particulate matter control;**
 - (e3) One (1) natural gas fired immersion fired steam boiler identified as 100971, with an **average** maximum heat input rate of 1.265 million (MM) British thermal units (Btu) per hour, and exhausting through stack # 7;**
 - (e4) Two (2) natural gas fired heaters identified as Heater # 1 and Heater # 2 (located in the storage area), each with an **average** maximum heat input rate of 0.024 MMBtu per hour, and exhausting through stacks 22 and 28, respectively;**
 - (e5) One (1) natural gas fired heater identified as unit heater (located in the machine shop), with an **average** maximum heat input rate of 0.025 MMBtu per hour, and exhausting through stack 17;**
 - (f6) One (1) natural gas fired heater identified as unit heater (located in the shipping), with an **average** maximum heat input rate of 0.144 MMBtu per hour, and exhausting through stack 29;**
 - (g7) One (1) natural gas fired heater identified as unit heater (located in the plating area), with an **average** maximum heat input rate of 0.15 MMBtu per hour, and exhausting through stack 18;**

- (h8) One (1) natural gas fired furnace identified as furnace (located in office #1), with an **average** maximum heat input rate of 0.1 MMBtu per hour, and exhausting through stack 2; ~~and~~
- (i9) One (1) natural gas fired furnace identified as furnace (located in office #2), with an **average** maximum heat input rate of 0.08 MMBtu per hour, and exhausting through stack 19-; **and**
- (j10) **One (1) polishing and blasting operation, with an average maximum capacity of 300.4 pounds per hour, using two (2) belting lathes with 2"x132" sanding belts, six (6) hand vibrating finishers (only two in operation at a time) and one (1) abrasive blasting machine, all utilizing one (1) cartridge dust collector for particulate matter control.**

Comment # 4

A.2(b) Sentence: with a maximum capacity of 397 pounds per hour; should read;
with an average maximum capacity of 397 pounds per hour.

Again, we are a job shop. Occasionally we will exceed 397 pounds per hour. As noted in the Permit Application form F.

Note: This is a job shop process. Product flow will change daily. Information presented is based on historical averages from the last twelve months. The average maximum is 397 pounds per hour.

A.2(b) Sentence: two (2) color buff lathes with two (2) stations each and one (1) slow speed satin buff, all utilizing one (1) bag house for particulate matter control; should read;
two (2) color buff lathes with two (2) stations each, all utilizing one (1) bag house for particulate matter control and one (1) slow speed satin buff.

This error is primarily our fault. We noted the slow speed satin buff on preliminary applications forms but did not transfer it to the final form. We listed the slow speed satin buff to make the applications complete but this machine does not throw off any particulate matter and is not connected to the bag house.

Response # 4

The following changes have been made to Section A.2(b) (now renumbered 2) of the permit.

- (b2) One (1) polishing and grinding operation, with an **average** maximum capacity of 397 pounds per hour, using one (1) flat stroke machine with one (1) 2" x 132" sanding belt, four (4) belting lathes with two (2) 2" x 132" sanding belts, four (4) buffing lathes with two (2) stations each, two (2) color buff lathes with two (2) stations each ~~and one (1) slow speed satin buff~~, all utilizing one (1) baghouse for particulate matter control **and one (1) slow speed satin buff**;

Comment # 5

A.2(b) through (i)

We understand these items need to be listed but are under the understanding they need to be listed in another area of the permit. There was a discussion of this at the October 18, 1995 Indiana Chromium Symposium which I attended. As I remember the discussion, all natural gas heating equipment had to be listed in the application so a determination if the 10,000,000 Btu input threshold was reached. If not, these items should be listed in the Insignificant and Trivial Activities section of the permit.

Buffing and Polishing is also listed as Insignificant Activities under Indiana Air Permit Guide, Appendix O. It is our understanding that the definition of Particle Matter is 100 microns or less and the total allowable of this material per process is 5 tons per year.

Response # 5

The Minor Source Operating Permit (MSOP) does not differentiate between significant and insignificant units. All emission units existing at the source will be listed under Section A.2 of the permit. Therefore no changes will be made to the Section A.2(b) through (i) of this permit.

Comment # 6

B.4 This paragraph should be eliminated, the facility already exists.

Response # 6

IDEM, OAM would have deleted Section B.4, except now the source is adding a "Polishing and Blasting Department" and thus the rule in Section B.4 applies. No changes were made to the permit as a result of this comment.

Comment # 7

B.6(a) & (b)

Again, the facility already exists and these are not applicable.

Response # 7

IDEM, OAM would have deleted Section B.6(a) and (b), except now the source is adding a "Polishing and Blasting Department" and thus rules in Section B.6(a) and (b) applies. No changes were made to the permit as a result of this comment.

Comment # 8

C.2(b) The Permittee shall implement the Preventive Maintenance Plans; should read;
The Permittee shall implement the Preventive Maintenance Plan.

Response # 8

The following changes have been made to Section C.2(b)

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

Comment # 9

- C.4 We would like to have added;
nothing in this section is to be constructed that Batesville Products, Inc. gives up any rights afforded to it under the law.

Response # 9

Section C.4 states the rules that apply for "inspection and entry". IDEM, OAM does not comprehend how the above statement is appropriate under the rule. No changes were made to the permit as a result of this comment.

Comment # 10

- C.4(d) We would like added;
samples are to be split, one given to Batesville Products, Inc. and one retained by the inspecting agency.
- C.4(e) We would like added;
copies of all results are to be given to Batesville Products, Inc.

Response # 10

The following changes have been made to Section C.4(d) as a result of this comment.

C.4 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements (**IDEM will split samples with Permittee upon the request of the Permittee prior to the sampling event**); and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements (**IDEM will provide Permittee with results of any testing upon the request of the Permittee**).

Comment # 11

C.6(d) Request this item be deleted since it is not applicable to the facility.

Response # 11

The following changes have been made to Section C.6(d) of this permit.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- ~~(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.~~
- (ed)** For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

Comment # 12

C.6(f) Add;
Permittee has a right to request the whole permit or any portion of the permit be revoked if processes covered cease to exist or are found not to be regulated or subject to permitting.

The explanation of this is as follows;

Upon attending the seminar for chrome permits, the seminar giver stated if we had polishing and buffing operations, we needed to include information on these items. We are under the impression this is an Insignificant Activity and should be listed as such. Since the process falls outside the parameters of the permitting process, we want the ability to have it or any process that falls outside the requirements to be removed from the permit.

Response # 12

All units that exist at the facility, either significant or insignificant have to be listed in the permit. The Minor Source Operating Permit (MSOP) does not differentiate between significant and insignificant activities. The source is under obligation to report to IDEM, OAM of any addition or modification of a significant or insignificant activity. Upon notification, IDEM, OAM will issue the source an appropriate permit. No changes were made to the permit as a result of this comment.

Comment # 13

C.7 Opacity

We request all of (c)(7) be deleted since it has no applicability to our facility.

Also, page 6 of 7, delete: 326 IAC 5-1 (Opacity Limitations)

Response # 13

The rule cited in Condition C.7 "Opacity" is 326 IAC 5-1-2 (Opacity). This condition is applicable to any facility that has the potential to emit particulate matter (PM) and the rule does not specify any significant level. For this source the polishing and grinding operation, the polishing and blasting operation, the steam boiler, the two (2) heaters, the three (3) unit heaters and the two (2) furnaces have potential particulate matter (PM) emissions. Therefore, these facilities would be subject to the requirements of 326 IAC 5-1-2 (Opacity). Also, natural gas facilities may substitute the Natural Gas Certification with a Visible Emissions Certification. There will be no changes to this condition in the final permit due to this comment.

Comment # 14

C.9 Needs to be deleted. This appears to apply to hard chromium, not decorative chromium.

Response # 14

Section C.9 (Performance Testing) applies to all chromium electroplating facilities (hard and decorative). No changes were made to the permit as a result of this comment.

Comment # 15

C.12 Change title of section to: Malfunction Report For Decorative Hexavalent Chrome Plating Tank.

Response # 15

Section C.12 (Malfunctions Report) applies to all facilities that exist at the source. Batesville Products, Inc. has other units at their plant besides the Decorative Hexavalent Chrome Plating Tank. Thus the title of Section C.12 cannot be changed to identify only one particular unit. No changes were made to the permit as a result of this comment.

Comment # 16

C.12(b)

when a malfunction of any facility or emissions; should read;

when a malfunction of any emissions control; the words "facility or" should be deleted.

As an example: if a polishing jack breaks, which the current definition would include, we would have to report this within one hour. If a polishing jack breaks, no air hazard exists. This is an unworkable items unless changed.

Response # 16

The only "malfunctions" that Batesville Products, Inc. are required to keep records of and report are those that cause violations of air pollution control rules. Also, it is only a reportable malfunction if it causes a violation. The word "facility" cannot be deleted because it could cause excess emissions particularly when it does not have a control device. No changes have been made to the permit as a result of this comment.

Comment # 17

C.12(d)

Eliminate the words "process or combustion or process equipment". Again, this item, as worded, is unnecessary and unworkable. If a piece of process equipment breaks down that is not related to air emissions, there is no air hazard but we would have to notify IDEM within an hour.

Response # 17

Only "malfunctions" that Batesville Products, Inc. are required to keep records of and report are those that cause violations of air pollution control rules. Also, it is only a reportable malfunction if it causes a violation. The words "process or combustion or process equipment" cannot be deleted because it could cause excess emissions particularly when it does not have a control device. No changes have been made to the permit as a result of this comment.

Comment # 18

C.15 (a) & (d)

This permit does not require quarterly reports.

Page 6 of 7, item (4) (a) & (b), needs to be deleted.

Response # 18

The following changes have been made to Section C.15(a) and (d).

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (ba) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (eb) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- ~~(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (ec) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) A malfunction as described in 326 IAC 1-6-2; or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (fd) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (ge) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Comment # 19

D.1(a) One (1) 300 gallon decorative chromium tank with a 3000 Ampere (amps) rectifier; should read;

One (1) 300 gallon decorative chromium tank with a maximum 3000 Ampere (amps) rectifier.

Response # 19

Since the permit has been on public notice, new decorative chromium plating language has been drafted by IDEM, OAM. The following changes have been made to Section D.1(a) due to the language change. The new language does not mention rectifier rate, which should satisfy the comment made by the source.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

~~(a) — One (1) 300-gallon decorative hexavalent chromium plating tank with a 3000-ampere (Amps) rectifier, identified as Tank # 20, using wetting agent type fume suppressant (identified as Ethone Zero Mist R 31176) as control and exhausting to stack # 12.~~

(1) One (1) Decorative Chromium Electroplating Operation consisting of:

(a) One (1) decorative chromium electroplating tank, identified as Tank # 20, using a hexavalent chromium bath, equipped with a wetting agent type fume suppressant, and exhausting to one (1) stack, identified as stack # 12.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment # 20

D.1.2(b)

Word "tanks" should be "tank"

D.1.5 Sentence reads; If testing is required, compliance with the emission limit of 0.01 milligrams per dry standard cubic meter shall be determined; should read;

If testing is required, compliance with the emissions limit of 45 dynes/cm (3.1×10^{-3} lbf/ft) shall be determined.

D.1.6(b) Second paragraph;

This requirement exceeds monitoring frequency noted in 326 IAC 20-8. I do not have a problem exceeding this frequency and previously agreed to weekly testing. See Attached. This would be the frequency of testing we would still be willing to agree to.

D.1.6(e)

We have installed two meters on the rectifier. One amp hr. and the second operating time. i.e. Time the rectifier is actually on. This 2nd meter gives actual operating time is what we would actually prefer to use. It is simple to use and accurate.

D.1.7(a)(3)

The total process operating time of each tank (not both combined) during the reporting period; should read:

The total process operating time of the tank, during the reporting period.

D.1.7(b)

Life of the tanks or until the tanks are; should read;

Life of the tank or until the tank is

D.1.8(e)(1)(2)

Should be changed to reflect the permit reporting requirements of Page 6 of 7, item (4).

Response # 20

Since the permit has been on public notice, extensive decorative chromium plating language has been updated by IDEM, OAM. The following changes have been made to Section D.1 due to the language change.

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated **by reference** as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

~~D.1.2 Chromium Electroplating NESHAP [326 IAC 20-8-1][40 CFR Part 63, Subpart N]~~

~~This facility is subject to 40 CFR Part 63, Subpart N, which is incorporated by reference as 326 IAC 20-8-1. A copy of this rule is attached:~~

~~(a) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from Tank # 20 by not allowing the surface tension of the electroplating bath contained within each tank to exceed forty-five (45) dynes per centimeter (dynes/cm) (3.1×10^{-3} pound-force per foot [lbf/ft]) at any time during operation of the tanks.~~

~~Pursuant to 40 CFR 63.343(c)(5)(i), the Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation, 0.01 mg/dscm (4.4×10^{-6} gr/dscf) in lieu of establishing the maximum surface tension during an initial performance test.~~

~~(b) The following work practice standards for the tanks are also applicable:~~

~~(1) At all times, including periods of startup, shutdown and malfunction, the Permittee shall operate and maintain the tanks, fume suppressant, and monitoring equipment in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.6.4.~~

~~(2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.6.4.~~

~~(3) Determination of whether acceptable operation and maintenance procedures are being used will be based on the information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP; procedures and records; and inspection of the source.~~

~~(4) Based on the results of the determination made under Condition D.6.2(b)(3) above, IDEM, OAM may require that the Permittee make changes to the OMP. Revisions may be required if IDEM, OAM finds that the plan:~~

- ~~_____ (A) Does not address a malfunction that has occurred;~~
- ~~_____ (B) Fails to provide for the operation of the tanks, air pollution control techniques (i.e., fume suppressant), or process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or~~
- ~~_____ (C) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.~~

D.1.2 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tank # 20. A copy of this rule is attached.

~~**D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]**~~

~~A Preventive Maintenance Plan (PMP), in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for Tank # 20.~~

D.1.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]

- ~~_____ (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.~~
- ~~_____ (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tank # 20 by:
 - ~~_____ (1) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.01 mg/dscm) [equivalent to four and four-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (4.4×10^{-6} gr/dscf)]; or~~
 - ~~_____ (2) Not allowing the surface tension of the decorative chrome bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent to three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb_f/ft)] at any time during operation of tank # 20 when a chemical fume suppressant containing a wetting agent is used.~~~~

~~**D.1.4 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]**~~

- ~~_____ (a) An Operation and Maintenance Plan (OMP), in accordance with 40 CFR 63.342(f)(3), shall be prepared and implemented no later than the compliance date. The OMP shall specify the operation and maintenance criteria for Tank # 20, fume suppressant, and monitoring equipment, and shall include the following elements:~~

- ~~_____ (1) Manufacturers recommendations for maintenance of the monitoring equipment used to measure surface tension;~~
- ~~_____ (2) Documentation of the operation and maintenance criteria for the tanks, fume suppressant, and monitoring equipment;~~
- ~~_____ (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;~~
- ~~_____ (4) A systematic procedure for identifying malfunctions of the tanks, fume suppressant, and monitoring equipment; and for implementing corrective actions to address such malfunctions;~~
- ~~_____ (b) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the OMP within forty five (45) days after such an event occurs.~~
- ~~_____ (c) Recordkeeping associated with the OMP is identified in Condition D.6.7. Reporting associated with the OMP is identified in Condition D.6.8.~~

D.1.4 Work Practice Standards [40 CFR 63.342(f)]

The following work practice standards apply to tank # 20:

- (a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tank # 20, including the wetting agent type fume suppressant and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.6.
- (b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.1.6.
- (c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.
- (d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.
- (e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAM may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAM finds that the plan:
 - (1) Does not address a malfunction or period of excess emissions that has occurred;
 - (2) Fails to provide for the operation of tank # 20, the wetting agent type fume suppressant and process monitoring equipment during a malfunction or

period of excess emissions in a manner consistent with good air pollution control practices; or

- (3) Does not provide adequate procedures for correcting malfunctioning process equipment, wetting agent type fume suppressant, monitoring equipment or other causes of excess emissions as quickly as practicable.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

~~The Permittee is not required to test this facility by this permit. However, IDEM, OAM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the emission limit of 0.01 milligrams per dry standard cubic meter shall be determined by a performance test conducted in accordance with the provisions of 40 CFR 63.344.~~

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP), in accordance with Section B-Preventive Maintenance Plan, of this permit, is required for tank # 20 and the wetting agent type fume suppressant.

D.1.6 Monitoring to Demonstrate Continuous Compliance [40 CFR 63.343 (c)(5) & (7)]

~~The Permittee shall monitor the surface tension of the electroplating baths in Tank # 20. Operation of the tank at a surface tension of greater than 45 dynes per centimeter shall constitute noncompliance with the standards. The surface tension of the tank in operation shall be monitored according to the following schedule:~~

- ~~(a) The surface tension shall be measured once every four (4) hours for the first forty (40) hours of operating time with a stalagmometer or a tensiometer as specified in 40 CFR 63, Appendix A, Method 306B (Surface Tension Measurement and Record Keeping for Chromium Plating Tanks Used at Electroplating and Anodizing Facilities). If a tensiometer is used to measure surface tension, the instructions given in ASTM Method D 1331-89, "Standard Test Methods for Surface and Interfacial Tension of Solutions of Surface Active Agents," must be followed.~~
- ~~(b) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of operating time, the surface tension measurement may be conducted once every eight (8) hours of operating time. Once there are no exceedances during forty (40) hours of operating time, surface tension measurement may be conducted once every forty (40) hours of operating time on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAM until an exceedance occurs.~~
- ~~The source agrees to conduct surface tension measurements, at a minimum, once each day of operation provided there are no more than forty (40) hours of operating time between successive surface tension measurements.~~
- ~~(c) Once an exceedance occurs through tank surface tension measurement, wetting agent shall be added and the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency of monitoring surface tension is allowed as stated in Condition D.6.6(b) above.~~

- ~~_____ (d) Once a tank or bath solution is drained and a new solution is added, the original surface tension monitoring schedule of once every four (4) hours must be resumed with a subsequent decrease in monitoring frequency allowed as stated in Condition D.6.6(b) above.~~
- ~~_____ (e) Operating time for chromium electroplating is that time when the rectifier is turned on and a part is in the tank. When there is no part in a tank for fifteen (15) or more minutes, that time will not be considered operating time; likewise, if the time between placing a part in the tank is less than fifteen (15) minutes, that time will be considered part of the operating time.~~

D.1.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tank # 20. The OMP shall specify the operation and maintenance criteria for tank # 20, the wetting agent type fume suppressant and monitoring equipment and shall include the following elements:**
 - (1) Manufacturers recommendations for maintenance of the monitoring equipment used to measure surface tension;**
 - (2) A standardized checklist to document the operation and maintenance criteria for tank # 20, the wetting agent type fume suppressant and the monitoring equipment.**
 - (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.**
 - (4) A systematic procedure for identifying malfunctions and periods of excess emissions of tank # 20, the wetting agent type fume suppressant and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.**
- (b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.1.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.1.6(a).**
- (c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tank # 20, the wetting agent type fume suppressant and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.**
- (d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent**

with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.

- (e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of tank # 20 or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.7 Performance Testing [326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

- (a) A performance test demonstrating initial compliance for tank # 20 was performed on October 31, 1995. Subsequent performance tests were also performed on August 7, 1996, October 7, 1996, and December 9, 1996.

During the initial performance test, it was determined that the surface tension of the bath, using Method 306B, Appendix A of 40 CFR 63, was 26 dynes/cm.

- (b) The Permittee is not required to further test tank # 20 by this permit. However, the IDEM may require testing when necessary to determine if the tank is in compliance. If testing is required by the IDEM, compliance with the limits specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of tank # 20, the wetting agent type fume suppressant or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

Operating time is defined as that time when the rectifier is on and there is a part in the tank. If Batesville Products' meter only records when rectifier is on (whether there is a part in the tank or not) that is not measuring operating time. If Batesville Products meter only records when rectifier is on and there is a part in the tank, they will be recording actual operating time which is acceptable. There is no need to change the existing language to read "it is okay to substitute a meter in lieu of logs".

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-6.1-5(a)(2)]

- (a) Pursuant to 40 CFR 63.343(c)(5)(ii) and (iii), when using a wetting agent in the electroplating bath to comply with the limits specified in Condition D.1.3, the Permittee shall monitor the surface tension of the electroplating baths. Operation of tank # 20 at a surface tension greater than 45 dynes per centimeter shall constitute noncompliance with the standards.
 - (1) The Permittee shall monitor the surface tension of the electroplating bath during tank operation according to the following schedule:

- (A) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of this part.
 - (B) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation.
 - (C) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (B) above. For example, if a Permittee had been monitoring a tank once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.
- (2) Once a bath solution is drained from tank # 20 and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures in paragraphs (B) and (C) above.
- (b) Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts is considered operating time.

Record Keeping and Reporting Requirements ~~[326 IAC 2-5.1-3(e)(2)]~~ [326 IAC 2-6.1-5(a)(2)]

~~D.1.7~~ Record Keeping Requirements ~~[40 CFR 63.346]~~

- ~~(a) The Permittee shall maintain records to document compliance with Conditions D.6.2 and D.6.4 using the forms provided with this permit. These records shall be maintained in accordance with the Section C condition entitled "General Record Keeping"~~

~~Requirements" of this permit, be kept for a period of five (5) years, and include a minimum of the following:~~

- ~~————— (1) ——— Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard, i.e., surface tension of the bath in each tank, including the date and time the data are collected. If a tensiometer is used to measure surface tension, a copy of ASTM Method D 1331-89, "Standard Test Methods for Surface and Interfacial Tension of Solutions of Surface Active Agents," must be included with the log book containing surface tension measurements.~~
- ~~————— (2) ——— The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs.~~
- ~~————— (3) ——— The total process operating time of each tank, not both combined, during the reporting period.~~
- ~~————— (4) ——— Records of the date, time, and amount of fume suppressants added to the electroplating bath(s).~~
- ~~————— (5) ——— All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.6.8.~~
- ~~————— (b) ——— The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of the tanks or until the tanks are no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMP on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.~~

D.1.9 Record Keeping Requirements [40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.1.3, D.1.4 and D.1.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the wetting agent type fume suppressant and monitoring equipment to document that the inspection and maintenance required by Conditions D.1.7 and D.1.8 have taken place. The record can take the form of a checklist and should identify the following:**
 - (1) The device inspected;**
 - (2) The date of inspection ;**
 - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and**
 - (4) Any actions taken to correct deficiencies found during the inspection,**

including the date(s) such actions were taken.

- (b) Records of all maintenance performed on tank # 20, the wetting agent type fume suppressant and monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tank # 20, monitoring equipment.
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tank # 20, and monitoring equipment as indicated by monitoring data collected in accordance with this condition.
- (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
- (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
- (g) Test reports documenting results of all performance tests.
- (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
- (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
- (j) The total process operating time, as defined in Condition D.1.8(b), of each the tank, during the reporting period.
- (k) Records of the date and time that fume suppressants were added to the electroplating bath, and the amount and type of fume suppressant added.
- (l) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.1.10.

~~D.1.8 Reporting Requirements [40 CFR 63.345 & 63.347]~~

- ~~(a) In accordance with 40 CFR 63.345, a notification must be submitted to IDEM, OAM prior to any change, modification, or reconstruction of the facility (including conducting electroplating operations that fall under the definition of hard chromium electroplating) or construction of a new facility or source. Notification shall be submitted as soon as practicable before the date construction or reconstruction commences.~~
- ~~(b) In accordance with 40 CFR 63.347(c)(2), a notification of the date when construction or reconstruction was commenced shall be submitted to IDEM, OAM no later than thirty (30) calendar days after such date. In addition, a notification of the actual date of startup of the new or reconstructed facility or source shall be submitted to IDEM, OAM within thirty (30) calendar days after such date. Additional notifications required under 40 CFR 63.345 and 63.347 shall be specified as they become due.~~

- _____ (c) The Permittee shall notify IDEM, OAM in writing of their intention to conduct a performance test at least sixty (60) calendar days before the test is scheduled to begin. Reports of performance test results shall be submitted no later than forty-five (45) days following the completion of the performance test, and shall be submitted as part of a notification of compliance status as described in 40 CFR 63.347(e), to the address listed in the Section C condition entitled "Performance Testing" of this permit.
- _____ (d) If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the OMP required in Condition D.6.4, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the OMP. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.
- _____ (e) The Permittee shall submit a summary report to document the ongoing compliance status of the facility using the Ongoing Compliance Status Report form provided with this permit. The report shall contain the information specified in 40 CFR 63.347(g)(3) that is applicable.
- _____ (1) This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAM. The report shall be submitted within thirty (30) days after the end of each reporting period, which ends June 30 and December 31 respectively.
- _____ (2) If the monitoring data collected by the Permittee in accordance with Condition D.6.6 show that the emission limit has been exceeded, quarterly reports shall be submitted. Once the Permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency, according to the procedures of 40 CFR 63.347(g)(2), is approved.

D.1.10 Reporting Requirements [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

The notifications and reports required in this section shall be submitted to IDEM, OAM using the address specified in Section C - General Reporting Requirements.

(a) Notifications:

(1) Initial Notifications

The Permittee shall notify IDEM, OAM in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).

(2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

(A) The NCS shall be submitted to IDEM, OAM, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).

(B) The NCS for tank # 20 shall be submitted to IDEM, OAM no later

than forty-five (45) days following completion of the compliance demonstration pursuant to Section C - Performance Testing.

(3) Notification of Construction or Reconstruction

Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAM. In addition, the Permittee may not change, modify, or reconstruct tank # 20 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAM.

(A) The NCR shall contain the information identified in 40 CFR 63.345(b)(2) and (3).

(B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling the existing tank and non-affected facilities by a common control technique or device [i.e., the addition of duct work to the CMP system (if a CMP system is used to demonstrate compliance with the chromium emission limitation)].

(C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tank # 20 serves as this notification.

(D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAM before construction, modification, or reconstruction may commence.

(b) Ongoing Compliance Status Report

The Permittee shall prepare summary reports to document the ongoing compliance status of tank # 20 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tank # 20 is located at a site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAM upon request.

(1) The Ongoing Compliance Status Report shall be complete according to the following schedule except as provided in paragraphs (c)(2).

(A) The first report shall cover the period from the issuance date of this permit to December 31 of the year in which the permit is issued.

(B) Following the first year of reporting, the report shall be completed

on a calendar year basis with the reporting period covering from January 1 to December 31.

- (2) If either of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM, OAM:
- (A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.8(b) for the reporting period; or
 - (B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.1.8(b).

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semiannually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

- (3) IDEM, OAM may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

Comment # 21

Section D.2

Two changes again;

1. Maximum capacity of 397 pounds per hour; changed to; maximum average capacity of 397 pounds per hour.
2. One (1) slow speed satin buff all utilizing one (1) bag house; remove; one (1) slow speed satin buff.

Response # 21

IDEM, OAM will use the word "average". The following changes have been made to the facility description in Section D.2.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b2) One (1) polishing and grinding operation, with an **average maximum** capacity of 397 pounds per hour, using one (1) flat stroke machine with one (1) 2" x 132" sanding belt, four (4) belting lathes with two (2) 2" x 132" sanding belts, four (4) buffing lathes with two (2) stations each, two (2) color buff lathes with two (2) stations each ~~and one (1) slow speed satin buff~~, all utilizing one (1) baghouse for particulate matter control **and one (1) slow speed satin buff**;
- (e3) One (1) natural gas fired immersion fired steam boiler identified as 100971, with a maximum heat input rate of 1.265 million (MM) British thermal units (Btu) per hour, and exhausting through stack # 7;
- (e4) Two (2) natural gas fired heaters identified as Heater # 1 and Heater # 2 (located in the storage area), each with a maximum heat input rate of 0.024 MMBtu per hour, and exhausting through stacks 22 and 28, respectively;
- (e5) One (1) natural gas fired heater identified as unit heater (located in the machine shop), with a maximum heat input rate of 0.025 MMBtu per hour, and exhausting through stack 17;
- (f6) One (1) natural gas fired heater identified as unit heater (located in the shipping), with a maximum heat input rate of 0.144 MMBtu per hour, and exhausting through stack 29;
- (g7) One (1) natural gas fired heater identified as unit heater (located in the plating area), with a maximum heat input rate of 0.15 MMBtu per hour, and exhausting through stack 18;
- (h8) One (1) natural gas fired furnace identified as furnace (located in office #1), with a maximum heat input rate of 0.1 MMBtu per hour, and exhausting through stack 2; ~~and~~
- (i9) One (1) natural gas fired furnace identified as furnace (located in office #2), with a maximum heat input rate of 0.08 MMBtu per hour, and exhausting through stack 19-; **and**
- (j10) **One (1) polishing and blasting operation, with an average capacity of 300.4 pounds per hour, using two (2) belting lathes with 2"x132" sanding belts, six (6) hand vibrating finishers (only two in operation at a time) and one (1) abrasive blasting machine, all utilizing one (1) cartridge dust collector for particulate matter control.**

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Comment # 22

Section D.2

Again, all items should be listed in the Insignificant and Trivial Activities Section. See comments: Page 4 & 5 of 25, A.2 (b) through (i).

Response # 22

The Minor Source Operating Permit (MSOP) does not differentiate between significant and insignificant units. Therefore no changes will be made to the Section A.2(b) through (i) of this permit.

Comment # 23

Section D.2.1

Based on the above, particulate matter emissions from the two sandblasters shall be limited to 1.39 pounds per hour.

We do not have any sandblasters and do not understand what is going on here.

Also, please note that there is no stack or outside air discharge from the Polishing and Grinding Department Bag House.

Response # 23

The following changes have been made to Section D.2.1(a).

D.2.1 Particulate Matter (PM)

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), particulate emissions from the polishing and grinding operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 * (0.1985)^{0.67} = 1.39 \text{ lbs PM/hour}$$

Based on the above equation, particulate matter emissions from the ~~two (2) sandblasters~~ **polishing and grinding operation** shall be limited to 1.39 pounds per hour.

The following revisions have been made to the Technical Support Document under the appropriate sections (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment # 24

Page 1 of 7

Items (b) through (i) should be listed in the Insignificant Activity Section of the Permit.

Response # 24

The Minor Source Operating Permit (MSOP) does not differentiate between significant and insignificant units. Therefore no changes will be made to the items (b) through (i) of this permit.

Comment # 25

What does the sentence "There are no unpermitted facilities operating at the source during this review process" mean?

Response # 25

The sentence means that all units currently existing at Batesville Products, Inc. are permitted by IDEM, OAM.

Comment # 26

In the Stack Summary Table, the Titles on Flow Rate (ACFM) and Temperature (EF) are reversed.

Response # 26

The following changes have been made to the Stack Summary table.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
#1	Sewer Vent-Bathroom - Office # 1	15.25	0.33	<100EF Unknown	Unknown < 100EF
#2	Space heating - Office #1	16.5	0.33	Unknown	Unknown
#3	Space heating - Office #1	16.5	0.33	Unknown	Unknown
#4	Sewer Vent-Bathroom Office #1	15.25	0.33	Unknown	Unknown
#6	Sewer Vent - Bathroom Plating Dept.	15.25	0.33	Unknown	Unknown
#7	Boiler Vent - Plating Dept.	19.75	1.0	Unknown	Unknown
#8	Space heating - Plating Dept.	19.0	0.583	Unknown	Unknown
#9*	Ventilator (Turbine) - Plating Dept.	19.0	2.0	<100EF Unknown	Unknown <100EF
#10*	Ventilator (Turbine) - Plating Dept.	18.75	2.0	<100EF Unknown	Unknown <100EF
#11*	Ventilator (Turbine) - Plating Dept.	18.583	2.0	<100EF Unknown	Unknown <100EF
#12	Chrome Tank Ventilator Exhaust - Plating Dept.	19.25	1.0	<100EF** Unknown**	Unknown <100EF
#13*	Ventilator (Turbine) - Plating Dept.	18.833	2.0	<100EF Unknown	Unknown <100EF
#14*	Ventilator (Turbine) - Buffing and Grinding	18.95	2.0	<100EF Unknown	Unknown <100EF
#15*	Ventilator (Turbine) - Buffing and Grinding	18.7	2.0	<100EF Unknown	Unknown <100EF
#16*	Ventilator (Turbine) - Machine Shop	18.45	2.67	<100EF Unknown	Unknown <100EF
#17	Space heating - Machine Shop	20.78	0.75	Unknown	Unknown
#18	Bathroom Exhaust Fan	20.53	0.33	<100EF Unknown	Unknown <100EF
#19	Space heating - Machine Shop	Wall Mtd.	Unknown	Unknown	Unknown
#20	Exhaust Fan - Office/(Conference Room) Storage	Wall Mtd.	N/A	<100EF Unknown	Unknown <100EF

#21*	Ventilator (Turbine) - Machine Shop	18.45	2.67	<100EF Unknown	Unknown <100EF
#22	Space heating - Office Storage	22.5	0.58	Unknown	Unknown
#28	Space heating - Office Storage	21.5	0.58	Unknown	Unknown
#29	Space heating - Shipping	27.92	0.75	Unknown	Unknown
#34*	Ventilator (Turbine) - Shipping	13.43	1.33	<100EF Unknown	Unknown <100EF

* Ventilates hot air from ceiling of room - used only in the summer, closed in winter.

** Estimated

Comment # 27

Federal Rule Applicability

(b)(3) should be eliminated. We elected the (45) dynes per centimeter standard.

Response # 27

Since the permit has been on public notice, extensive decorative chromium plating language has been updated by IDEM, OAM. The following changes have been made to the Federal Rule Applicability. The updated language includes the (45) dynes per centimeter standard elected by the source.

(b) ~~The chromium electroplating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium electroplating operations are subject to the following conditions:~~

~~_____ The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart N.~~

~~_____ (1) The surface tension of the chromium electroplating bath contained with the tank shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance~~

~~_____ (2) Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.~~

~~_____ (3) An alternative emission limit of 0.01 milligram per day standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.~~

____ (4) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

____ Indiana Department of Environmental Management
____ Air Compliance Branch, Office of Air Management
____ Chromium Electroplating
____ 100 North Senate Avenue, P.O. Box 6015
____ Indianapolis, Indiana 46206

____ (5) The chromium electroplating operations shall be subject to the record keeping and reporting requirement as indicated in the chromium electroplating NESHAP.

(b) Tank # 20 is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium electroplating operations are subject to the following conditions:

(1) Emission Limitation:

The permittee shall comply with the requirements of this condition on and after the compliance date for the tanks.

(a) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tank # 20 by:

(1) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.01 mg/dscm) [equivalent to four and four-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (4.4×10^{-6} gr/dscf)]; or

(2) Not allowing the surface tension of the anodizing bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent to three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lbf/ft)] at any time during operation of tank # 20 when a chemical fume suppressant containing a wetting agent is used.

(2) Monitoring Requirements:

The surface tension of the chromium electroplating bath contained with the tank shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.

Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.

An alternative emission limit of 0.01 milligram per dry standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.

- (3) **Reporting Requirements:**
A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Management
Chromium Electroplating
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206

- (4) The chromium electroplating operations shall be subject to the record keeping and reporting requirements as indicated in the chromium electroplating NESHAP.

Comment # 28

State Rule Applicability

Entire source 326 IAC 5-1 (Opacity Limitations) should be deleted. Not applicable to this permit.

Response # 28

326 IAC 5-1 (Opacity Limitations) is applicable to any facility that has the potential to emit particulate matter (PM) and the rule does not specify any significant level. For this source the polishing and grinding operation, the steam boiler, the two (2) heaters, the three (3) unit heaters and the two (2) furnaces have potential particulate matter (PM) emissions. Therefore, these facilities would be subject to the requirements of 326 IAC 5-1-2 (Opacity). There will be no changes to this condition in the final permit due to this comment.

Comment # 29

State Rule Applicability - Individual Facility 326 IAC 6-2-4.

A. The one (1) natural gas fired boiler (EV-259) for emergency stand by use only, rated at 12.553 mmbtu per hour.

should read;

The one (1) natural gas fired boiler (100971) rated at 1.265 mmbtu per hour.

B. Also, this should be listed in the Insignificant Activity Section.

Response # 29

The following changes have been made to the State Rule Applicability - Individual Facility.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) natural gas fired boiler (~~EU-259~~**100971**) ~~for emergency stand by use only~~, rated at ~~12.553~~ **1.265** MMBtu per hour, is subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, the boiler is limited by the following equation from 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. indirect heater input = ID No. 100971 = 1.265 MMBtu/hr

$$Pt = 1.09/1.265^{0.26} = 1.03 \text{ lbs PM/MMBtu}$$

However, pursuant to 326 IAC 6-2-4, indirect heating units with a heat input rate (Q) of less than 10 MMBtu/hr shall be limited to 0.60 lb/MMBtu heat input. Therefore, PM emissions from the one (1) 1.265 MBtu/hr boiler shall be limited to 0.60 lb/MMBtu heat input.

Comment # 30

326 IAC 6-3-2 (Process Operations)

A. Should be listed in the Insignificant Activity Section and;

B. We do not have any sandblasters.

326 IAC 6-3-2 (Compliance Calculation)

(.18 tons PM/YR) is incorrect. This is discussed in Comment # 1. The correct number is 4.753 tons PM/YR.

Response # 30

The following changes have been made to 326 IAC 6-3-2 (Process Operations)

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the polishing and grinding operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 * (0.1985)^{0.67} = 1.39 \text{ lbs PM/hour}$$

Based on the above equation, particulate matter emissions from the ~~two (2) sandblasters~~ **polishing and grinding operation** shall be limited to 1.39 pounds per hour.

Compliance calculation:

$$(\del{0.18} \mathbf{4.76} \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = \del{0.04} \mathbf{1.09} \text{ lbs PM/hr}$$

Actual lbs PM/hr (~~0.04~~ **1.09**) is less than the allowable lbs PM/hr (1.39), therefore the polishing and grinding operation will comply with the requirements of 326 IAC 6-3-2.

The following revisions have been made to the Technical Support Document under the appropriate sections (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Source Background and Description

Source Name: Batesville Products, Inc.
Source Location: 434 Margaret Street, Lawrenceburg, IN 47025
County: Dearborn
SIC Code: 3429
Operation Permit No.: MSOP 029-11732-00032
Permit Reviewer: Nishat Hydari / EVP

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) **One (1) Decorative Chromium Electroplating Operation consisting of:**
 - (a) **One (1) decorative chromium electroplating tank, identified as Tank # 20, using a hexavalent chromium bath, equipped with a wetting agent type fume suppressant, and exhausting to one (1) stack, identified as stack # 12;**
 - (b2) One (1) polishing and grinding operation, with an **average** ~~maximum~~ capacity of 397 pounds per hour, using one (1) flat stroke machine with one (1) 2" x 132" sanding belt, four (4) belting lathes with two (2) 2" x 132" sanding belts, four (4) buffing lathes with two

- (2) stations each, two (2) color buff lathes with two (2) stations each and one (1) slow speed satin buff, all utilizing one (1) baghouse for particulate matter control;
- (e3) One (1) natural gas fired immersion fired steam boiler identified as 100971, with an **average** maximum heat input rate of 1.265 million (MM) British thermal units (Btu) per hour, and exhausting through stack # 7;
- (d4) Two (2) natural gas fired heaters identified as Heater # 1 and Heater # 2 (located in the storage area), each with an **average** maximum heat input rate of 0.024 MMBtu per hour, and exhausting through stacks 22 and 28, respectively;
- (e5) One (1) natural gas fired heater identified as unit heater (located in the machine shop), with an **average** maximum heat input rate of 0.025 MMBtu per hour, and exhausting through stack 17;
- (f6) One (1) natural gas fired heater identified as unit heater (located in the shipping), with an **average** maximum heat input rate of 0.144 MMBtu per hour, and exhausting through stack 29;
- (g7) One (1) natural gas fired heater identified as unit heater (located in the plating area), with an **average** maximum heat input rate of 0.15 MMBtu per hour, and exhausting through stack 18;
- (h8) One (1) natural gas fired furnace identified as furnace (located in office #1), with an **average** maximum heat input rate of 0.1 MMBtu per hour, and exhausting through stack 2; and
- (i9) One (1) natural gas fired furnace identified as furnace (located in office #2), with an **average** maximum heat input rate of 0.08 MMBtu per hour, and exhausting through stack 19-; and
- (j10) **One (1) polishing and blasting operation, with an average capacity of 300.4 pounds per hour, using two (2) belting lathes with 2"x132" sanding belts, six (6) hand vibrating finishers (only two in operation at a time) and one (1) abrasive blasting machine, all utilizing one (1) cartridge dust collector for particulate matter control.**

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.20 5.97
PM-10	0.24 6.01

SO ₂	0.00
VOC	0.04
CO	0.67
NO _x	0.79

HAP's	Potential To Emit (tons/year)
Chromium compounds	Less than 10
TOTAL	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The existing source is subject to 326 IAC 20-8 but not subject to 326 IAC 2-5.5-1(b)(2) (registration) because the source uses hexavalent chromium for decorative coating instead of trivalent chromium and the source emits less than major source levels (see statement (a) above). Therefore, the source is subject to the provisions of 326 IAC 2-6.1-3(a).

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.02 0.08
PM10	0.06 0.12
SO ₂	0.00
VOC	0.04
CO	0.67
NO _x	0.79
Single HAP	< 10.0
Combination HAPs	< 25.0

- (a) This new source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the polishing and grinding operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 * (0.1985)^{0.67} = 1.39 \text{ lbs PM/hour}$$

Based on the above equation, particulate matter emissions from the ~~two (2) sandblasters~~ **polishing and grinding operation** shall be limited to 1.39 pounds per hour.

Compliance calculation:

$$(0.18 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.04 \text{ lbs PM/hr}$$

Actual lbs PM/hr (0.04) is less than the allowable lbs PM/hr (1.39), therefore the polishing and grinding operation will comply with the requirements of 326 IAC 6-3-2.

- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the polishing and blasting operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 * (0.1502)^{0.67} = 1.15 \text{ lbs PM/hour}$$

Based on the above equation, particulate matter emissions from the polishing and blasting operation shall be limited to 1.15 pounds per hour.

Compliance calculation:

$$(1.19 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.27 \text{ lbs PM/hr}$$

Actual lbs PM/hr (0.27) is less than the allowable lbs PM/hr (1.15), therefore the polishing and grinding operation will comply with the requirements of 326 IAC 6-3-2.

On June 14, 2000, Justin C. Weber, Jr., Executive Vice President of Batesville Products, Inc. submitted additional comments. The summary of the comments and corresponding responses is as follows (bolded language has been added, the language with a line through it has been deleted):

Comment # 1

Section D.1.8(b)

In an effort to be precise and minimize errors in reporting, we have installed a meter on the chrome rectifier, which shows the time the rectifier is on. This is a non-resetable timer and at the end of a shift an exact time can be read from it. This is what I would like to use as operating time.

We have found that errors have occurred when we depend on a minimum wage operator reading and interpreting a clock and then writing down what he thought he read. We have installed timers and signaling devices on all tanks so the operators don't have to do this. Your definition now depends on these individuals doing this reading correctly, which has not happened in the past and I can be in violation if he screws up.

On 05/31/00, we conducted a test using the proposed definition with our most skilled operator. At the end of the shift we reviewed the results and found a 23% error in his recording times. We also found that it took him approx. 13½ minutes to make these additional recordings and approx. 12 minutes of foremen time doing the necessary calculations at the end of the shift. This equates to an additional expense of \$6,323.00 per year, per shift. We feel this expense is uncalled for and simply allowing us to use that meter would yield more accurate, reliable, and cost efficient data.

The Environmental Protection Agency's 40 CFR Parts 9 and 63 provides a definition for tank operation. Copy attached. Our meter is in compliance with that definition. Your definition is not. This will cause me to maintain two sets of records. Your definition needs to be the same as the EPA's.

Response # 1

40 CFR 63.340, Subpart N defines tank operation as "the time in which current and/or voltage is being applied to a chromium electroplating tank or a chromium anodizing tank". Batesville Products, Inc. has installed a meter on their decorative chromium tank which records operating time. Upon speaking with

Justin C. Weber, Jr. the following additional information was received regarding the chromium tank and the meter installed.

1. When a part is placed in the chromium electroplating tank, the tank is turned on and the meter starts recording operating time.
2. When the part is removed from the chromium electroplating tank, the tank is turned off and the meter stops recording operating time.
3. This process is repeated throughout the day and at the end of the shift the operating time is read from the meter and recorded.

IDEM, OAM has reviewed the additional information and has decided that the meter used at Batesville Products, Inc. is consistent with the EPA's definition of operating time. The use of the meter to record operating time is also acceptable by IDEM, OAM provided the meter is operated such that it records when a part is in the tank and the rectifier is on. The following changes have been made to the Section D.1.8(b) of the permit as a result of this comment.

D.1.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-6.1-5(a)(2)]

- (b) Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts is considered operating time. The meter installed on the rectifier to measure operating time is acceptable provided the meter is operated such that it records when the rectifier is on and there is a part in the tank.**

Comment # 2

Section D.2

The only reason I am making a comment is I have asked this question 3 times and have received 3 conflicting answers. The following is how I understand the wording of these items in the permit. If there is a difference, please respond.

IDEM has made a decision, for simplification purposes, to include all emission units in one document. Because Indiana is now permitting Decorator Chrome tanks and we now fall under this permit requirements, these other units are now added to this permit document.

Because these units are added to the permit document does not mean the units are subject to additional requirements, testing, or reporting. If the Decorator Chrome tank is removed from the premises, we can apply and have this permit revoked and the units will be listed in the appropriate venue and not remain in a permit.

Response # 2

Pursuant to the revised 326 IAC Article 2 rules and specifically 326 IAC 2-5.5-2, Batesville Products, Inc. was required to apply for a permit because the source was subject to 326 IAC 20-8. The potential to emit of the other emission units at the source at the time of application submittal was below 5 tons per year for any criteria pollutant. Thus the source is correct in assuming it was required to obtain a permit

because Indiana is now permitting decorative chromium tanks.

Since the application submittal, the source has decided to add another emission unit to its facility (please refer to comment # 1 submitted by the source). The addition of this new unit will increase the potential to emit of PM and PM10 (excluding the decorative chrome tanks) to greater than 5 tons per year. 326 IAC 2-5.5-1(b) states "On and after the effective date of this rule, this rule applies to the following existing sources:

- (1) Sources with a potential to emit within the following ranges:
 - (A) Less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either particulate matter (PM) or particulate matter less than ten (10) microns (PM10)."

326 IAC 2-5.5-1(c) states "No person subject to subsection (b) shall operate an existing source subject to this rule without registering the source with the commissioner."

If the source removes the decorative chrome tanks from the plant, it would still need to have a permit for the other emission units because the potential to emit of PM and PM10 of these units is above 5 tons per year. Failure to acquire the proper permit would result in a violation of Indiana's air permitting laws and possible enforcement action against the source.

Comment # 3

Technical Support Document (TSD) for a Minor Source Operating Permit

Permit Emission Units - Pollution Control Equipment

- (a) should be changed to match permit A.2(1).
- (b) should be changed to match permit A.2(2).

Stack Summary - should be changed to correct chart on the addendum page 37.

Source Status chart should be changed to correct chart on the addendum, page 37.

State Rule Applicability - Individual Facility

Serial # of Boiler is not (EV-259)

Also is not 12.553 BTU

Data in permit, page 4 of 28 - A.2(3) is correct and it is not a stand by boiler.

Response # 3

The changes made to the Permit Emission Units - Pollution Control Equipment have been documented on page 35 of this addendum.

The changes made to the Stack Summary have been documented in response # 26.

The changes made to the Source Status chart have been documented on page 37 of this addendum.

The changes made to the State Rule Applicability - Individual Facility have been documented in response # 29.

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment # 4

Addendum to the Technical Support Document for Minor Source Operating Permit

D.2.1(a) Emissions from the two sandblasters
should read,
Emissions from the Polishing and Grinding operations

Response # 2 Grain loading rate have
should read,
Grain loading rate has

D.1.9(j) Of each tank
should read
Of the tank

Response # 4

The changes to Section D.2.1(a) are addressed in comment and response # 23.

Response # 2 has been changed to read "grain loading rate has".

Section D.1.9(j) has been changed to read "of the tank".

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Batesville Products, Inc.
Source Location: 434 Margret Street, Lawrenceburg, IN 47025
County: Dearborn
SIC Code: 3429
Operation Permit No.: MSOP 029-11732-00032
Permit Reviewer: Nishat Hydari / EVP

The Office of Air Management (OAM) has reviewed an application from Batesville Products, Inc. relating to the operation of Decorative Hexavalent Chromium Electroplating manufacturing facility.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) 300 gallon decorative hexavalent chromium plating tank with a 3000 ampere (Amps) rectifier, identified as Tank # 20, using wetting agent type fume suppressant (identified as Ethone Zero Mist R 31176) as control and exhausting to stack # 12;
- (b) One (1) polishing and grinding operation, with a maximum capacity of 397 pounds per hour, using one (1) flat stroke machine with one (1) 2" x 132" sanding belt, four (4) belting lathes with two (2) 2" x 132" sanding belts, four (4) buffing lathes with two (2) stations each, two (2) color buff lathes with two (2) stations each and one (1) slow speed satin buff, all utilizing one (1) baghouse for particulate matter control;
- (c) One (1) natural gas fired immersion fired steam boiler identified as 100971, with a maximum heat input rate of 1.265 million (MM) British thermal units (Btu) per hour, and exhausting through stack # 7;
- (d) Two (2) natural gas fired heaters identified as Heater # 1 and Heater # 2 (located in the storage area), each with a maximum heat input rate of 0.024 MMBtu per hour, and exhausting through stacks 22 and 28, respectively;
- (e) One (1) natural gas fired heater identified as unit heater (located in the machine shop), with a maximum heat input rate of 0.025 MMBtu per hour, and exhausting through stack 17;
- (f) One (1) natural gas fired heater identified as unit heater (located in the shipping), with a maximum heat input rate of 0.144 MMBtu per hour, and exhausting through stack 29;
- (g) One (1) natural gas fired heater identified as unit heater (located in the plating area), with a maximum heat input rate of 0.15 MMBtu per hour, and exhausting through stack 18;

- (h) One (1) natural gas fired furnace identified as furnace (located in office #1), with a maximum heat input rate of 0.1 MMBtu per hour, and exhausting through stack 2; and
- (i) One (1) natural gas fired furnace identified as furnace (located in office #2), with a maximum heat input rate of 0.08 MMBtu per hour, and exhausting through stack 19.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
#1	Sewer Vent-Bathroom - Office # 1	15.25	0.33	<100EF	Unknown
#2	Space heating - Office #1	16.5	0.33	Unknown	Unknown
#3	Space heating - Office #1	16.5	0.33	Unknown	Unknown
#4	Sewer Vent-Bathroom Office #1	15.25	0.33	Unknown	Unknown
#6	Sewer Vent - Bathroom Plating Dept.	15.25	0.33	Unknown	Unknown
#7	Boiler Vent - Plating Dept.	19.75	1.0	Unknown	Unknown
#8	Space heating - Plating Dept.	19.0	0.583	Unknown	Unknown
#9*	Ventilator (Turbine) - Plating Dept.	19.0	2.0	<100EF	Unknown
#10*	Ventilator (Turbine) - Plating Dept.	18.75	2.0	<100EF	Unknown
#11*	Ventilator (Turbine) - Plating Dept.	18.583	2.0	<100EF	Unknown
#12	Chrome Tank Ventilator Exhaust - Plating Dept.	19.25	1.0	<100EF**	Unknown
#13*	Ventilator (Turbine) - Plating Dept.	18.833	2.0	<100EF	Unknown
#14*	Ventilator (Turbine) - Buffing and Grinding	18.95	2.0	<100EF	Unknown
#15*	Ventilator (Turbine) - Buffing and Grinding	18.7	2.0	<100EF	Unknown
#16*	Ventilator (Turbine) - Machine Shop	18.45	2.67	<100EF	Unknown
#17	Space heating - Machine Shop	20.78	0.75	Unknown	Unknown
#18	Bathroom Exhaust Fan	20.53	0.33	<100EF	Unknown
#19	Space heating - Machine Shop	Wall Mtd.	Unknown	Unknown	Unknown
#20	Exhaust Fan - Office/(Conference Room) Storage	Wall Mtd.	N/A	<100EF	Unknown
#21*	Ventilator (Turbine) - Machine Shop	18.45	2.67	<100EF	Unknown

#22	Space heating - Office Storage	22.5	0.58	Unknown	Unknown
#28	Space heating - Office Storage	21.5	0.58	Unknown	Unknown
#29	Space heating - Shipping	27.92	0.75	Unknown	Unknown
#34*	Ventilator (Turbine) - Shipping	13.43	1.33	<100EF	Unknown

* Ventilates hot air from ceiling of room - used only in the summer, closed in winter.

** Estimated

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on December 27, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 3).

Chromium emissions (Single HAP) from the biggest source in Indiana is less than ten (10) tons per year and Batesville Products, Inc. is a much smaller source in comparison. So no calculations were necessary for this source because the emissions from this source will be less than ten (10) tons per year.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	0.20
PM-10	0.24
SO ₂	0.00
VOC	0.04
CO	0.67
NO _x	0.79

HAP's	Potential To Emit (tons/year)
Chromium compounds	Less than 10
TOTAL	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The existing source is subject to 326 IAC 20-8 but not subject to 326 IAC 2-5.5-1(b)(2) (registration) because the source uses hexavalent chromium for decorative coating instead of trivalent chromium and the source emits less than major source levels (see statement (a) above). Therefore, the source is subject to the provisions of 326 IAC 2-6.1-3(a).

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Chromium Tank	0.0	0.0	0.0	0.0	0.0	0.0	< 10.0
Total Emissions	0.0	0.0	0.0	0.0	0.0	0.0	< 25.0

County Attainment Status

The source is located in Dearborn County.

Pollutant	Status
PM-10	attainment
SO ₂	unclassifiable
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dearborn County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.02
PM10	0.06
SO ₂	0.00
VOC	0.04
CO	0.67
NO _x	0.79
Single HAP	< 10.0
Combination HAPs	< 25.0

- (a) This new source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) The one (1) natural gas fired boiler identified as 100971, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc), because the boiler capacity is less than 10 MMBtu per hour.
- (b) The chromium electroplating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium electroplating operations are subject to the following conditions:

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart N.

- (1) The surface tension of the chromium electroplating bath contained with the tank shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.
- (2) Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be

conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.

- (3) An alternative emission limit of 0.01 milligram per day standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.
- (4) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Management
Chromium Electroplating
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206

- (5) The chromium electroplating operations shall be subject to the record keeping and reporting requirement as indicated in the chromium electroplating NESHAP.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Dearborn County and the potential to emit of any of the criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) natural gas fired boiler (EU-259) for emergency stand by use only, rated at 12.553 MMBtu per hour, is subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, the boiler is limited by the following equation from 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. indirect heater input = ID No. 100971 = 1.265 MMBtu/hr

$$Pt = 1.09/1.265^{0.26} = 1.03 \text{ lbs PM/MMBtu}$$

However, pursuant to 326 IAC 6-2-4, indirect heating units with a heat input rate (Q) of less than 10 MMBtu/hr shall be limited to 0.60 lb/MMBtu heat input. Therefore, PM emissions from the one (1) 1.265 MBtu/hr boiler shall be limited to 0.60 lb/MMBtu heat input.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the polishing and grinding operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 * (0.1985)^{0.67} = 1.39 \text{ lbs PM/hour}$$

Based on the above equation, particulate matter emissions from the two (2) sandblasters shall be limited to 1.39 pounds per hour.

Compliance calculation:

$$(0.18 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.04 \text{ lbs PM/hr}$$

Actual lbs PM/hr (0.04) is less than the allowable lbs PM/hr (1.39), therefore the polishing and grinding operation will comply with the requirements of 326 IAC 6-3-2.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this Decorative Hexavalent Chromium Electroplating manufacturing facility shall be subject to the conditions of the attached proposed **Minor Source Operating Permit 029-11732-00032**.

Appendix A: Emission Calculations

Company Name: Batesville Products, Inc.
Address City IN Zip: 434 Margaret Street, Lawrenceburg, IN 47025
CP: 029-11732
Plt ID: 029-00032
Reviewer: Nishat Hydari / EVP

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Polishing and Grinding	Polishing and Blasting	TOTAL
PM	0.02	4.76	1.19	5.97
PM10	0.06	4.76	1.19	6.01
SO2	0.00	0.00	0.00	0.00
NOx	0.79	0.00	0.00	0.79
VOC	0.04	0.00	0.00	0.04
CO	0.67	0.00	0.00	0.67
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Polishing and Grinding	Polishing and Blasting	TOTAL
PM	0.02	0.05	0.01	0.08
PM10	0.06	0.05	0.01	0.12
SO2	0.00	0.00	0.00	0.00
NOx	0.79	0.00	0.00	0.79
VOC	0.04	0.00	0.00	0.04
CO	0.67	0.00	0.00	0.67
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Batesville Products, Inc.
Address City IN Zip: 434 Margaret Street, Lawrenceburg, IN 47025
CP: 029-11732
Plt ID: 029-00032
Reviewer: Nishat Hydari / EVP

Heat Input Capacity
MMBtu/hr

1.8

Potential Throughput
MMCF/yr

15.9

Facilities	MMBtu/hr
Steam boiler	1.265
Heater # 1	0.024
Heater # 2	0.024
Unit Heater	0.025
Unit Heater	0.144
Unit Heater	0.15
Furnace	0.1
Furnace	0.08
Total	1.812

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.02	0.06	0.00	0.79	0.04	0.67

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Process Particulate Emissions
Polishing and Grinding Department**

Company Name: Batesville Products, Inc.
Address City IN Zip: 434 Margaret Street, Lawrenceburg, IN 47025
CP: 029-11732
Plt ID: 029-00032
Reviewer: Nishat Hydari / EVP

State Potential Emissions (tons/year)						
A. Baghouses						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
Polishing and Grinding Baghouse	1	0.0001809	4.94	1,418	99.00%	4.76
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						4.76
Federal Potential Emissions (tons/year)						
A. Baghouses						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
Polishing and Grinding Baghouse	1	0.0001809	4.94	1,418	99.00%	0.05
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls						0.05

Methodology:

State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

ESP (tons/yr) = No. Units * Loading (grains/acf) * Face Velocity (ft/sec) * Surface Area (ft²) * 1 lb/7,000 grains * 60 sec/min * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Scrubber (tons/yr) = No. Units * Loading (grains/acf) * Flow Rate (gpm) * 1/Liquid to Air Ratio (gpm/1,000 acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

ESP (tons/yr) = No. Units * Loading (grains/acf) * Face Velocity (ft/sec) * Surface Area (ft²) * 1 lb/7,000 grains * 60 sec/min * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Scrubber (tons/yr) = No. Units * Loading (grains/acf) * Flow Rate (gpm) * 1/Liquid to Air Ratio (gpm/1,000 acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Appendix A: Process Particulate Emissions

Company Name: Batesville Products, Inc.
Address City IN Zip: 434 Margaret Street, Lawrenceburg, IN 47025
CP: 029-11732
Pit ID: 029-00032
Reviewer: Nishat Hydari / EVP

Polishing and Blasting Department

Cartridge Dust Collector:

PM/PM10:	0.00003102 gr/acf outlet x	5120 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr =	1.19 tons/yr (uncontrolled)
	where the baghouse control efficiency is listed at	99.50%				0.01 tons/yr (controlled)